

**Wyckoff Eagle Harbor Superfund Site  
SSC Ecology – EPA Quarterly Coordination Meeting**

**Agenda and Meeting Summary - FINAL  
10/12/16 1:00 to 3:00 – Conference Call**

**MEETING ATTENDEES**

Beth Sheldrake, EPA	Barry Rogowski, Ecology
Helen Bottcher, EPA	Sandra Caldwell, Ecology
Deb Sherbina, EPA	Hun Seak Park, Ecology
	Sam Meng, Ecology
	Susannah Edwards, Ecology
	Dawn Hooper, Ecology

**AGENDA AND MEETING SUMMARY**

1. Progress Review – Ecology O&M Tasks

- Operational status
  - Sam provided an update on GW treatment plant
    - Maintenance done, treatment plant online. Sending weekly samples to lab this month and for the toxicity test. No exceedances found.
    - Observed operations this summer to see start up and shut down.
    - Carbon filters replaced August.
    - May close the plant during the predicted storms this week as a precautionary measure to avoid power surges during the storm.
  - Hun Seak adds
    - Replacing carbon every 2 years. \$40,000.
    - SSC required GW elevation reports has been submitted to EPA.
    - Hydraulic control performance is successful, no releases detected.
    - HMI replacement is needed at 12 years old. Planning to replace it in April 2017.
    - Ecology is determining how long they will need to manage the treatment plant. Barry notes that there should enough funding for carbon change outs. Asks to be kept informed of budget status. Ecology will continue to request funds from the legislature to fund their obligations at the site.
  - Helen asks about continued funding after the state biennium. Ecology will continue to request an operational budget of 1M/year from the legislature and is dependent on those decisions.

2. Progress review – EPA tasks, status, schedule review

- MCC replacement status
  - EPA reports on the status. The MCC is the electrical wiring for the wellfield. Repair efforts over the summer were unsuccessful as no qualified small business contractors offered a bid on the project. They will request the funds be allowed for a future renewed bid process. They will open it up to larger firms and expect better success. She will divide effort by landscape maintenance and electrical panel replacement and plans put RFB out in that order. Landscape in February to avoid migratory bird impacts. Ecology and EPA agreed that since operations will be shut down to conduct the electrical work that it's best to wait until next summer (dry season).
- Response to Public Comments
  - Status of Response Preparation and key discussion items.
    - Helen hasn't had time to review the draft responses as prepared by CH2MH. She will review them and has a few items to discuss with Ecology.
      - Ecology's comment regarding a sediment cleanup level vs clam tissue remedial goal. Helen needs to talk with EPA folks more about SMS as a legal ARAR requirement at this point in the Wyckoff project and how it fits with EPA decisions on tissue analysis. **Ecology suggests a focused discussion with EPA on this question prior to constructing a response.**
      - Suggestion to use biological treatment as earlier proposed by Fred Schleffler.
      - There are a number of other comments that they need to focus on including comments preferring use of Alternative 4. The schedule seems to be the driver many preferring Alternative 4. Helen will focus with team in November/December on how to refine the existing proposal to respond to the public concern about the schedule for bringing the property back into public use. EPA will need to balance discussions about this with Ecology with consideration to their framework for deliberative process as required by EPA's guidance.
- Schedule – Final FFS development status and planned milestones in ROD process (review schedule from July 2016 notes)
  - EPA expects to have a draft ROD and Response to Comments in February and will submit to EPA HQ in March, with target date for signing in May.
  - Current comments under review on the proposed plan are related to the FFS. Helen will look at comments then at the FFS to see whether any changes are needed based on comments from the public. Hoping to finalize the FFSs in December so that they will be issued with the ROD.

- Ecology has reviewed a draft of the FFS. EPA will let Ecology know about where they are landing based on comments and will discuss any related changes to the FFS with Ecology.
- EPA stated the 2017-2019 match estimates are not expected to change. Ecology will continue to request leg appropriated for EPA match requests.
- Wall corrosion status – approach
  - Helen brought up the concerns about the speed with which corrosion is occurring. They had a sheet pile wall expert visit the site last week. He was very surprised by the rate of corrosion and suggests that the replacement of the wall be moved to the start of the cleanup construction schedule. They wonder whether it's a result of poor quality steel.
  - EPA is seeking funds to support further investigation by CH2MH to review wall thickness and to give an updated estimate of how much time remains before the wall replacement will be necessary. EPA will also ask CH2MH to look at whether corrosion extends below the mudline. They don't expect that it has but will ask CH2MH to dig down 5-7 feet to review the condition of the submerged wall.
  - Ecology suggests a timeframe of 3-5 years until replacement will be necessary. EPA is focusing their attention to quickly address this question.
- Phase 1 cap repair status
  - Cap material quality – Helen reports the material is from the Snohomish River and that it meets EPA criteria and SMS screening numbers. Susannah reports that with additional information provided by EPA, Ecology doesn't have concerns about the material.
  - EPA has submitted RFB for OU1 cap construction. Applicants are working on bids now and they are due 10/24/16. It will be issued by 10/31/16. The work will be completed by 2/15/17 to meet fish window requirements. EPA will conduct community outreach regarding the repair.
  - Transfer of O&M for the Cap to Ecology is expected and will be discussed further.

### 3. OU1 Monitoring and Potential Transfer to Ecology

- OU1 subtidal monitoring – status, SAP review
  - Also see Response to Comments item 1.1. Starting up discussion of five-year review and how new criteria in SMS may change cleanup levels. Ecology is working through how to implement these changes and would like to talk through how this can apply at this site. Helen asks if this is a broader discussion with other staff from EPA and Ecology or just within the site team. Helen thinks that EPA would reopen a cleanup decision if evidence exists that the cleanup in place isn't protective. Examples of such situations would require big changes in allowable

levels (eg. Lead) that would show that it's no longer protective. State clarification of rules doesn't seem to constitute a change in protective levels. ARARs are frozen at the ROD unless it's a protectiveness issue. It doesn't appear to be from EPA's perspective. Two level discussion of technical and policy application are going on. Ecology and EPA are continuing to discuss at their regular meetings. **Ecology will be convening a larger discussion as well.**

- **Ecology and EPA agree to further discuss ARARs through the lens of a 5 year review (due next year, start writing in April).** EPA has a lot of new information to summarize and review through the five-year review. Will not have dioxin data in that discussion. The dioxin data would be collected as the OU1 subtidal construction is completed. It would inform updates to the fish advisory rather than changing a stand-alone COC. The goal would be to assure that fish consumption is addressed. Barry agrees that this approach is not unreasonable. Ecology will discuss more but seems reasonable not to stall the current work.
- More sampling will occur this year and will inform the pending five year review (due next summer). The draft SAP needs a lot of work and is being worked on by the Corps. **Helen is reviewing the current draft and will forward if she finds the draft of acceptable quality.** The expected lab results in March and will include in the 5 year report.

**Future Quarterly Meetings:**

December 14, 2016 (with Jim and Cami)

March 8, 2016 (tentative)